

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 00-6258-CR-FERGUSON

UNITED STATES OF AMERICA)
)
)
 v.)
)
)
 LIDIA ESTER RAMOS,)
)
 Defendant.)
 _____)

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**GOVERNMENT'S SUPPLEMENTAL RESPONSE
TO STANDING DISCOVERY ORDER**

The United States of America hereby files this supplemental response to the *Standing Discovery Order* issued in this case. This supplemental response is numbered to correspond to that Order.

- A. 1. There were telephone conversations and meetings recorded during the investigation. Attached please find the following of transcripts from tape recordings marked N-72 and N-73: AUGUST 23, 2000 12:05 P.M. TELEPHONE CONVERSATION, AUGUST 23, 2000 12:30 P.M. TELEPHONE CONVERSATION, AUGUST 23, 2000 4:00 P.M. TELEPHONE CONVERSATION, AUGUST 23, 2000 4:03 P.M. TELEPHONE CONVERSATION, AUGUST 23, 2000 4:05 P.M. TELEPHONE CONVERSATION, and AUGUST 23, 2000 9:00 P.M. TELEPHONE CONVERSATION.
5. Books, papers, documents, etc., which the government intends to use as evidence at trial to prove its case in chief, or which were obtained from or belong to the defendant, may be inspected by making an *appointment with undersigned counsel*. Such items include, but are not limited to, the following, copies of which are attached: see A1.
- B. The United States requests the disclosure and production of materials enumerated as items 1, 2 and 3 of Section B of the Standing Discovery Order. This request is also made to pursuant to Rule 16(b) of the **Federal Rules of Criminal Procedure**.

49

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the **Federal Rules of Criminal Procedure**, Brady, Giglio, Napue, and the obligation to assure a fair trial.

In addition to the request made above by the government pursuant to both Section B of the Standing Discovery Order and Rule (16)b of the **Federal Rules of Criminal Procedure**, in accordance with Rule 12.1 of the **Federal Rules of Criminal Procedure**, the government hereby demands Notice of Alibi defense; the approximate time, date, and place of the of the offense were:

1. Date: On or about August 23 and 24, 2000
Place: Pembroke Lakes Mall, Pembroke Pines, Florida; Swayne Plumbing at 6299 Johnson Street, Hollywood, Florida; Raymond's Grocery Store at 6301 Johnson Street, Hollywood, Florida; and 3361 SW 38 Street in Hollywood, Florida.

Respectfully submitted,


GUY A. LEWIS
UNITED STATES ATTORNEY

By: 

DONALD F. CHASE, II
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed this 31st day of January 2001 to Nelson Rodriguez, Esquire, 6780 Coral Way, Miami, Florida 33155.



DONALD F. CHASE, II
ASSISTANT UNITED STATES ATTORNEY